

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHARLES CORTEZ, an individual,
HILMA CORTEZ, an individual, as
co-successors-in-interest to Decedent
Michael Cortez, J.S., a minor by and
Through her Guardian Ad Litem,
Serina Sagon, individually and as
co-successor-in-interest to Decedent,
L.C., a minor by and through her
Guardian Ad Litem, Ashley Mabutas,
individually and as
co-successor-in-interest to Decedent,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

M.P.C., a minor, by his mother Justine
Pasion, successor-in-interest to Decedent
Michael Cortez,

Nominal Defendant.

Civil Action No. 3:23-cv-01222-TSH

DECLARATION OF WILLIAM L. HARRIS

In accordance with Title 28, United States Code Section 1746, I, William L. Harris, do
declare and state as follows:

1. I am the Unit Chief of the Discovery Unit II (DU) of the Federal Bureau of
Investigation (FBI), Office of the General Counsel (OGC), at FBI Headquarters, Washington,
D.C. I have served in this capacity since March, 2023. I have been employed with the FBI since
September, 1991.

2. The statements contained in this declaration are based upon my personal knowledge, my review and consideration of documents available to me in my official capacity, and on information obtained from other FBI employees.

3. DU provides litigation support to the other units in OGC, as well as numerous other entities. DU is responsible for locating, reviewing, and processing for release, any and all responsive materials which pertain to litigation and administrative matters in which the Bureau is directly or indirectly involved. As Unit Chief of DU II, I am responsible for overseeing the Paralegal Specialists who locate, review, process, and produce documents related to a variety of document production requests.

4. I have access to the records contained in the FBI's Central Records System (CRS). I am also personally familiar with the FBI's records maintenance and retrieval system.

5. All records contained in the CRS are identifiable through the FBI's practice of indexing records to a particular subject matter or individual. Once indexed, a record pertaining to a particular subject matter or individual is retrievable through a search of the general indices to the CRS. In short, the CRS is the FBI's official system of records for all investigative, administrative, and official business of the FBI.

6. The CRS enables the FBI to maintain information it has acquired while fulfilling its mandated law enforcement responsibilities. The records maintained here consist of administrative, applicant, criminal, personnel, and other files compiled for law enforcement purposes. Searching the FBI's CRS is the means by which the FBI can determine what retrievable information, if any, the FBI may have in its files on a particular subject matter or individual.

7. As the Unit Chief, I oversaw the Paralegal Specialists, who performed a diligent search of the general indices to the CRS as of October 26, 2023. The Paralegal Specialists performed searches of the CRS by each of the full names included in the caption of the Third Amended Complaint in this matter: Charles Cortez, Hilma Cortez, Jonathan Cortez, Serina Sagon, Ashley Mabutas, or Justine Paison. The search did not locate any administrative claim presented to the FBI by or on behalf of Jonathan Cortez, Serina Sagon, Ashley Mabutas, or Justine Paison. Only the administrative claims of Charles Cortez and Hilma Cortez, attached collectively as Exhibit A, were located.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 31st day of October, 2023

William L. Harris

William L. Harris
Unit Chief, Discovery Unit II
Office of the General Counsel
Federal Bureau of Investigation
Washington, D.C.